REMARKS

Claims 1-10, 12-18, 20, 22-24, 26, and 28 are pending. Claims 1, 12, and 18 are in independent form.

As a threshold matter, Applicant would like to address a contention raised in the Response to Arguments on page 2 of the outstanding Office action. In particular, the Response to Arguments contends that replacement of a destination address in an Ethernet header means modifying the layer-3 header of the packet.

Although Applicant disagrees on general principles with any interpretation that limits general claim terms to specific examples found in the specification, Applicant thanks the Examiner for pointing out that a destination address in an Ethernet header is not necessarily "replaced" in the disclosed implementations. *See also Specification*, page 7, line 15-18 (describing that component 300 completes a layer-2 encapsulation of a packet with a MAC address and transmits the encapsulated packet through a proxy-egress-port).

As shown above, claims have been amended to recite that data and/or data packets are labeled and/or encapsulated. Applicant also expressly disclaims any arguments that relied upon replacement of a destination address to distinguish over

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the cited references and apologizes for any inconvenience or confusion that these arguments may have caused.

In the action mailed May 16, 2006, claim 1 was rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,587,469 to Bragg (hereinafter "Bragg") and U.S. Patent No. 6,522,627 to Mauger (hereinafter "Mauger").

As amended, claim 1 relates to an apparatus that includes a a first component configured to perform a route look-up to identify a proxy egress port by which a data packet is to leave the first component, to send an Address Resolution Protocol (ARP) request for a hardware address of an egress port by which the data packet is to leave a networking router architecture to reach the receiver, and to label the data packet with information identifying the hardware address of the egress port, a second component comprising the egress port and configured to receive the data packet, and an intermediate component bridging the first component and the second component to forward the data packet based on the hardware address of the egress port.

Bragg and Mauger neither describe nor suggest a first component configured to send an ARP request for a hardware address of an egress port and to label the data packet with information identifying the hardware address of the egress port, as recited in claim 1.

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In this regard, Mauger describes that tunnels that include a series of nodes can be "defined" in an MPLS network. *See, e.g., Mauger*, col. 3, line 55-58. An MPLS stack of labels that describes such defined tunnels can be appended to the current header of a packet and used to determine the outward routing of the packet at the nodes as the packet passes through the tunnel. *See, e.g., Mauger*, col. 4, line 30-37.

It appears that the MPLS stack of labels that describe a "defined" MPLS tunnel are found at an originating node prior to the arrival of a data packet. Thus, there is no need to send an ARP request for a hardware address of an egress port and to label the data packet with information identifying the hardware address of the egress port, as recited in claim 1. Instead, it appears that the stack of MPLS labels that is to be appended to a datagram is already present in the forwarding component.

Bragg does nothing to remedy this deficiency in Mauger. In particular, Bragg neither describes nor suggests a first component configured to send an ARP request for a hardware address of an egress port and to label the data packet with information identifying the hardware address of the egress port, as recited in claim 1.

Accordingly, claim 1 is not obvious over Bragg and Mauger. Applicant thus requests that the rejections of claim 1 and the claims dependent therefrom be withdrawn.

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Attorney's Docket No.: Intel 10559-229001/P8794

Claim 12 was rejected under 35 U.S.C. § 103(a) as obvious over Bragg and Mauger.

As amended, claim 12 relates to a method that includes performing a lookup in a routing table to determine a proxy egress port by which data is to leave a component, sending a request for an address of an egress component by which the data is to leave a networking router architecture to reach a receiver, receiving a reply to the request, the reply including the address of the egress component, labeling the data with the address to identify the egress component, and forwarding the data, based on the address, through an intermediate component to the egress component.

Bragg and Mauger neither describe nor suggest sending a request for an address of an egress component by which the data leaves a networking router architecture to reach the receiver and labeling the data with the address to identify the egress component, as recited in claim 12.

In this regard, Mauger describes that tunnels that include a series of nodes can be "defined" in an MPLS network, and it appears that the MPLS stack of labels that describe such a "defined" MPLS tunnel are found at an originating node prior to the arrival of a data packet. Thus, there is no need to send a request for an address of an egress component by which the data leaves a networking router architecture to reach the receiver,

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or to label the data with the address to identify the egress component. Instead, it appears that the stack of MPLS labels that is to be appended to a datagram is already present in the forwarding component.

Bragg does nothing to remedy this deficiency in Mauger. In particular, Bragg neither describes nor suggests sending a request for an address of an egress component by which the data leaves a networking router architecture to reach the receiver and labeling the data with the address to identify the egress component.

Accordingly, claim 12 is not obvious over Bragg and Mauger. Applicant thus requests that the rejections of claim 12 and the claims dependent therefrom be withdrawn.

Claim 18 was rejected under 35 U.S.C. § 103(a) as obvious over Bragg and Mauger.

As amended, claim 18 relates to a an article that includes one or more machine-readable media that store machine-executable instructions. The instructions cause one or more machines to perform a look up in a routing table to determine a proxy egress port by which data is to leave the one or more machines, send a request for a media access control (MAC) address of an egress component by which the data is to leave a networking router architecture to reach a receiver, receive a reply to the request, the reply including the MAC address of the egress

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component, label the data with the MAC address of the egress component, and forward the data, based on the MAC address, through an intermediate component to the egress component.

Bragg and Mauger neither describe nor suggest instructions that cause a machine to send a request for a MAC address of an egress component and label the data with the MAC address of the egress component, as recited in claim 18.

In this regard, Mauger describes that tunnels that include a series of nodes can be "defined" in an MPLS network, and it appears that the MPLS stack of labels that describe such a "defined" MPLS tunnel are found at an originating node prior to the arrival of a data packet. Thus, send a request for a MAC address of an egress component and label the data with the MAC address of the egress component. Instead, it appears that the stack of MPLS labels that is to be appended to a datagram is already present in the forwarding component.

Bragg does nothing to remedy this deficiency in Mauger. In particular, Bragg neither describes nor suggests instructions that cause a machine to send a request for a MAC address of an egress component and label the data with the MAC address of the egress component, as recited in claim 18.
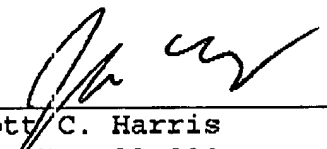
Accordingly, claim 18 is not obvious over Bragg and Mauger. Applicant thus requests that the rejections of claim 1 and the claims dependent therefrom be withdrawn.

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It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant asks that all claims be allowed. No fees are believed due at this time. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: July 16, 2006   _____
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